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BY EMAIL

Committee on Energy and Technology
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Conservation Law Foundation Testimony in partial opposition/partial support: *H.B. No. 5510*, AN ACT CONCERNING ELECTRIC, ZERO EMISSION AND HYDROGE VEHICLES.

Dear Senator Doyle, Representative Reed, and members of the Committee on Energy and Technology:

Conservation Law Foundation (CLF) is a nonprofit environmental organization committed to conserving natural resources, protecting public health, and promoting thriving communities throughout New England. CLF has long supported the promotion of EVs and ZEVs as a means to reduce carbon emissions associated with global warming.

CLF provides this testimony in partial opposition/partial support to Proposed H.B. No. 5510, An Act Concerning Electric, Zero Emission and Hydrogen Vehicles, and request the revisions contained herein. Several of this bill's provisions are beneficial, including sections 2, 5, and 6. However, others are unnecessary, confusing, or discourage the growth of clean vehicles in Connecticut. If appropriately amended, this bill could help Connecticut reduce greenhouse gas (GHG) emissions and local air pollutants by encouraging the use of electric vehicles (EVs) and other zero-emission vehicles (ZEVs). The transportation sector contributes 40% of the Connecticut's GHG emissions, and increased adoption of EVs and ZEVs is critical to ensure that the state meets its goal of reducing these emissions at least 80 % by 2050. CLF strongly urges the committee to amend the bill per the recommendations below.

I. Sections 1, 3, 4, and 8 should be amended.

a. Section 1.

The bill's definitions for "electric vehicle" (subsection 2) and "zero emission vehicle" (subsection 7) should not include hybrids and plug-in hybrids, which are not generally included in such definitions. Further, these established technologies do not require the same incentives as fully electric and zero-emission vehicles.

b. Section 3

Section 3 clarifies that EV charging stations (EVSE) do not qualify as a “utility,” “public utility,” or “public service company.” We support this, however, the bill would benefit from also stating that: owners/operators of EVSE do not fall under the terms of these definitions solely on the basis of such ownership or operation; and owners or operators of EVSE do not qualify as an “electric distribution company” or “electric supplier.”

c. Section 4

Section 4 misleadingly defines “public” EVSE as *free* public EVSE, and defines “private” charging stations as those that allow access to anyone. These definitions should be removed, and new definitions should be added for the following: EV charging station, public EV charging station, and publicly accessible parking space.

Due to these flawed definitions, Section 8 currently requires a time of day rate to be established *only* for EV charging stations that allow access to anyone (*i.e.*, public EVSE), and not for residential or commercial charging. This is an ill-advised approach, as time of day rates are most effective for residential and commercial customers, and should be available to those sectors as well.

d. Section 8

Subsection (b) should require the owner or operator of a public EVSE to disclose information to a database. The provision currently requires DMV to do this, which would be ineffective given that DMV does not currently receive this information.

The subsection (e) prohibition on membership-only EV charging stations is too broad and could stifle business development. This subsection should apply only to public EVSE and should require public access for all.

II. Sections 7, 9, 10, and 11 should be omitted.

a. Section 7

This section conflicts with national standards adopted by Connecticut and should therefore be omitted.

b. Section 9

Section 9 discourages the installation of EVSE by requiring an annual registration fee. While registration may ultimately be helpful, fees are not necessary or advisable until EV deployment is much further along than it is now. The focus for the time being should be on encouraging deployment, not adding hurdles that could stifle much needed progress in this area.

c. Sections 10 and 11

These sections would require adoption of EV charging standards in the National Institute of Standards and Technology Handbook 44 and Handbook 130, which the Department of Consumer Protection has already adopted.

III. Sections 2, 5, and 6 should be maintained.

a. Section 2

Collecting data on the number of EVs registered in Connecticut, and making that information public, is critical. In particular, it helps us measure our progress toward the *State Zero-Emission Vehicle Programs Memorandum of Understanding*¹ and *Multi-State ZEV Action Plan*, in which the signatory states (including Connecticut) agreed to a collective goal of getting 3.3 million ZEVs on the road by 2025.² In Connecticut, this goal requires the state to have at least 155,105 ZEVs by 2025. This section should be maintained in the bill.

b. Sections 5 and 6

Requiring the state and electric utilities to plan for increased EV charging is critical to cost-effective EV deployment. This section should be maintained in the bill.

In conclusion, CLF opposes H.B. 5510 unless the bill is amended in accordance with the changes recommended in this testimony. We encourage amendment of this bill to promote the effective deployment of EVs and ZEVs in Connecticut. We are glad to discuss or answer questions with the Committee.

Thank you for your time and consideration in this matter.

Respectfully submitted,



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